

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BROSNAN RISK CONSULTANTS, LTD.,

Plaintiff,

-against-

AARON MURAUSKAS; QUIENTEN  
BOSTON; and CONTROLLED F.O.R.C.E.,  
INC.,

Defendants.

Case No. 22-cv-02995

Judge Manish S. Shah

Magistrate Judge Sunil R. Harjani

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Brosnan Risk Consultants, Ltd. ("Brosnan") moves for a temporary restraining order against Defendants Aaron Murauskas ("Murauskas"), Quienten Boston ("Boston") and Controlled F.O.R.C.E., Inc. ("Controlled Force") (collectively, "Defendants"). Plaintiff further requests that oral argument on its Motion to be scheduled as soon as possible. In support of this Motion, Plaintiff states:

1. Brosnan is a security services company that provides, among other things, security officer and guard services to its clients. Brosnan has built its reputation in the industry on the good will and relationships it has built with its employees and clients.

2. Murauskas and Boston are former Brosnan employees who signed agreements containing confidentiality and employee and customer non-solicitation provisions. Murauskas left Brosnan in January 2022 to join Controlled Force, a direct competitor in the security industry. Since that time, Murauskas has violated the employee non-solicitation provisions in his agreement by successfully recruiting Boston to Controlled Force and attempting to recruit other Brosnan employees, including two critical Human Resources employees, over to Controlled Force. Boston

has also violated the employee non-solicitation provision by recruiting Brosnan security personnel to work for Controlled Force.

3. Murauskas and Boston also have violated the customer non-solicitation provisions of their agreements by recruiting and diverting at least one Brosnan client accountable for over \$1.6 million in revenue to Controlled Force in May 2022.

4. At all times, Controlled Force was aware of, and wrongfully induced, these breaches by Murauskas and Boston.

5. Defendants' wrongful conduct is detailed further in the accompanying Memorandum in Support, which is incorporated herein by reference.

6. Plaintiff is entitled to a temporary restraining order in this matter because they have suffered or will suffer irreparable harm if Defendants' actions are not enjoined, because they have no adequate remedy at law, and because they are likely to succeed on the merits of their claims. Further, the balance of harms and the public interest strongly support the issuance of an injunction in this case.

7. The legal arguments and authorities supporting this Motion are set forth in Plaintiffs' separate Memorandum in Support filed concurrently with Motion.

8. Plaintiff respectfully requests an immediate hearing on this matter and a timely hearing on a preliminary injunction.

WHEREFORE, for the reasons set forth above and in the supporting Memorandum of Law, Plaintiff respectfully requests that the Court grant its Motion, including entry of an Order in the form that will be submitted forthwith.

Respectfully submitted,

/s/ Todd M. Church

James M. Witz  
Todd M. Church  
LITTLER MENDELSON, P.C.  
321 North Clark St., Suite 1100  
Chicago, IL 60654  
(312) 372-5520  
*Attorneys for Plaintiff*

Dated: June 8, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on June 8, 2022, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF System. I further certify that I have served the foregoing via process server to the following:

Aaron Murauskas  
171 W. Fullerton Ave.  
Glendale Heights, IL 60139

Quierten Boston  
1213 14th Ave. SE  
St. Cloud, Minnesota 56034

Controlled F.O.R.C.E., Inc.  
ATTN: Diana Grano, President and CEO  
335 N. River St., Ste. 200  
Batavia, IL 60510

/s/ Todd M. Church  
Attorney for Plaintiff

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